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Siskiyou; Jeremiah LaRue and Jesus
Fernandez, in their official capacities
as members of the Siskiyou County
Sheriff's Department and in their individual
capacities; Brandon Criss, Ed Valenzuela,
Michael N. Kobseff, Nancy Ogren, and
Ray A. Haupt, in their official capacities
as members of the Siskiyou County Board
of Supervisors and in their individual
capacities; Edward Kiernan, in his official
capacity as County Counsel for Siskiyou
County and in his individual capacity;
and DOES 1-100.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

Dilevon Lo, Jerry Vang, Nathan Thao, Mao
Thao, Pao Lee, Antonio Lee, Koua Lee, Nhia
Thai Vang, Zeng Lee, Der Lee and Khue Cha

Plaintiffs,

vs.

County of Siskiyou; Jeremiah LaRue and
Jesus Fernandez, in their official capacities as
members of the Siskiyou County Sheriff's
Department and in their individual capacities;
and Brandon Criss, Ed Valenzuela, Michael
N. Kobseff, Nancy Ogren, and Ray A. Haupt,
in their official capacities as members of the
Siskiyou County Board of Supervisors and in
their individual capacities; Edward Kiernan,
in his official capacity as County Counsel for
Siskiyou County and in his individual
capacity; and DOES 1-100,

Defendants.

Case No.: 2:21-cv-00999-KJM-DMC

**DEFENDANTS' OBJECTIONS TO THE
AFFIDAVIT OF DER LEE DATED JULY
7, 2021 (CM/ECF NO. 23)**

Complaint Filed: June 4, 2021

First Amended Complaint Filed: July 15, 2021

Date: August 6, 2021

Time: 10:00 AM

**[FEES EXEMPT PURSUANT TO
GOVERNMENT CODE SECTION 6103]**

Defendants hereby submit their objections to the affidavit filed by Der Lee in support of Plaintiffs' original motion for TRO and preliminary injunction and the current motion for preliminary injunction.

Material Objected To:	Grounds for Objection:	Ruling on Objection:
Affidavit of Der Lee, July 7, 2021, ¶3	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶4	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶5	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶6	Lacks foundation.	Sustained: _____
“	Irrelevant.	Overruled: _____
	Hearsay. (FRE 801)	
	Prejudicial, confusing and misleading (FRE 403)	
¶8	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶9	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶10	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
	Lacks foundation.	
	Inadmissible opinion. (FRE 701)	
¶11	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶12	Irrelevant.	Sustained: _____
“	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____

1		Speculation.	
2	¶14	Inadmissible opinion. (FRE 701)	
3	“	Irrelevant.	
4		Prejudicial, confusing and misleading (FRE 403)	
5		Speculation.	
6	¶15	Inadmissible opinion. (FRE 701)	
7	“		